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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA

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IN RE:  
GRYPHON GOLD CORPORATION,  
a Nevada corporation,  
  
Debtor.

Case No. 13-51496-mkn  
(Chapter 11)

**DEBTOR'S EX-PARTE MOTION  
TO TRANSFER CASE TO RENO  
DIVISION PURSUANT TO  
L.R. 1015.1(c)**

Hearing Date: N/A

COMES NOW, GRYPHON GOLD CORPORATION, a Nevada corporation (hereinafter "Debtor"), by and through its proposed attorney, STEPHEN R. HARRIS, ESQ., of HARRIS LAW PRACTICE LLC, and hereby files its DEBTOR'S EX-PARTE MOTION TO TRANSFER CASE TO RENO DIVISION PURSUANT TO L.R. 1015.1(c), and represents and alleges as follows:

1. On July 29, 2013, the Debtor filed with this Court a Voluntary Petition for relief under Chapter 11 of the Bankruptcy Code commencing this bankruptcy reorganization case.

2. No trustee has been appointed and Debtor acts as Debtor-in-Possession herein. Debtor is a publically traded corporation whose primary asset is a 36% membership interest in

1 the Borealis Mining Company, LLC, a Nevada limited liability company that operates a gold  
2 mine in Mineral County, Nevada.

3 3. Upon filing, the Debtor's Chapter 11 case was automatically assigned to the  
4 Honorable Mike K. Nakagawa pursuant to Local Rule 1015.1. Due to the fact that Judge  
5 Nakagawa is located in Las Vegas, Nevada, the Debtor would respectfully request reassignment  
6 of its Chapter 11 case to a Bankruptcy Judge in the Reno Division.  
7

8 4. The Debtor's principal representatives are located outside of the State of Nevada,  
9 but because the primary asset is located near Hawthorne, Nevada, elected to file in the Reno  
10 bankruptcy court. The Debtor has extremely limited liquid assets, and the added expense of  
11 travel costs for the Debtor's counsel to appear in Las Vegas will deplete valuable resources in  
12 this case. The creditors, shareholders and lenders which do not have principal business  
13 locations in Northern Nevada are more sophisticated creditors with business locations in various  
14 cities around the country and in Canada, and certain shareholders have already engaged counsel  
15 in Northern Nevada.  
16

17 5. Pursuant to Local Rule 1015.1, this Court has authority to reassign the instant  
18 Chapter 11 case to the Reno division. Local Rule 1015.1(c) states as follows:  
19

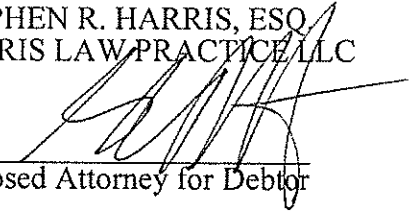
20 **Reassignment.** Within five (5) days of the filing of its petition, the debtor  
21 may request a transfer of the debtor's case to another division of the court  
22 for cause shown and as the interests of justice may require. The judge  
23 initially assigned to the case shall make the determination of cause and the  
24 interests of justice. The debtor may make a request under this subsection  
25 on an ex parte basis. Nothing in this section shall affect the right of any  
26 other party in interest to request a change of venue to another division.

27 Debtor believes cause is shown for reassigning its case to the Reno division, and it would be in  
28 the best interest of the Debtor's estate and creditors to reassign this Chapter 11 case to the Reno  
division.

1           **WHEREFORE**, Debtor respectfully requests that its Chapter 11 case be reassigned to  
2 the Reno, Nevada division; and for such other and further relief as the Court deems just under  
3 the circumstances.

4           DATED this 31st day of July, 2013.

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6           STEPHEN R. HARRIS, ESQ.  
7           HARRIS LAW PRACTICE LLC

8             
9           Proposed Attorney for Debtor